UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v. Civ No. 00-105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

PLAINTIFFS-JUDGMENT CREDITORS' MOTION TO STRIKE DEFENDANTS' OBJECTIONS TO AND COMPEL COMPLIANCE WITH CERTAIN REQUESTS CONTAINED IN PLAINTIFFS-JUDGMENT CREDITORS' THIRD REQUEST FOR PRODUCTION

For the reasons set forth in the attached Memorandum, the Plaintiffs-Judgment Creditors hereby respectfully move for an ORDER

- (1) Striking the objections asserted by the Palestinian Authority ("PA") to certain requests for production (that are specified in the attached Memorandum) contained in Plaintiffs-Judgment Creditors' Third Request of Defendant-Judgment Debtor the Palestinian Authority for Production of Documents and Things Relevant to Defendants-Judgment Debtors' Rule 60(b)(6) Motion and compelling the PA to comply fully with those requests for production;
- (2) Striking the objections asserted by the Palestine Liberation Organization ("PLO") to certain requests for production (that are specified in the attached Memorandum) contained in Plaintiffs-Judgment Creditors' Third Request of Defendant-Judgment Debtor the Palestine Liberation Organization for Production of Documents and Things Relevant to Defendants-Judgment Debtors' Rule 60(b)(6) Motion and compelling the PLO to comply fully with those requests for production;

(3) Granting any other relief that the Court finds just, necessary or appropriate.

Dated: November 5, 2010

Plaintiffs-Judgment Creditors, by their Attorneys,

/s/ David J. Strachman
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RULE 37 CERTIFICATE

I HEREBY CERTIFY that I made a good faith effort to resolve the within discovery dispute with opposing counsel prior to the commencement of this motion practice.

/s/ David J. Strachman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 5, 2010, a true and genuine copy of the foregoing was filed by ECF which served Defendants' counsel of record listed below:

Deming E. Sherman Edwards Angell Palmer & Dodge LLP 2800 Bank Boston Plaza Providence, RI 02903

Richard A. Hibey Mark J. Rochon Brian Hill Miller & Chevalier Chartered. 655 Fifteenth Street, N.W., Suite 900 Washington, DC 20005-5701

Additionally, this document was hand delivered to the following counsel on November 5, 2010:

Deming E. Sherman Edwards Angell Palmer & Dodge LLP 2800 Bank Boston Plaza Providence, RI 02903

/s/ David J. Strachman